

### REMARKS

Claims 1, 33-36, 54-58, 77-95 are pending in the application, with claims 1, 54, 77, 82, 87 and 91 being independent. Claims 77-90 have previously been withdrawn.

Claims 1, 54 and 91 have been amended for clarity and in response to the objection to the drawings and to those claims. Applicant submits that the drawings clearly show an insulating film disposed between the scanning lines and the signal lines and between the first plurality of conductive layers and the second plurality of conductive layers, as recited in each of amended claims 1, 54 and 91. For example, Fig. 6 shows first support members 301, 302 and 303 made from the same material as the scanning lines (i.e., "the first plurality of conductive layers") and second support members 304 made from the same materials as the signal lines (i.e., "the second plurality of conductive layers"). See the application at page 9, lines 4-17. Fig. 6 also shows that the members 301-303 are separated from the members 304 by an interlayer insulation layer 220 (i.e., "an insulating film") that also separates the scanning lines from the signal lines. See the application at page 9, lines 8-11.

The claims have been rejected as being unpatentable over Mawatari in view of Tanaka and JP 6-51332. Applicant requests reconsideration and withdrawal of this rejection because neither Mawatari, Tanaka, JP 6-51332, nor any combination of the three describes or suggests an insulating film disposed between a first plurality of conductive layers and a second plurality of conductive layers, as recited in each of independent claims 1, 54 and 91.

The rejection indicates that the first and second conductive films 25 and 26 of Tanaka correspond to the first and second plurality of conductive layers that are recited in the rejected claims and that Tanaka's conductive layers could be used to modify Mawatari. However, as noted in the prior response, Tanaka's conductive layers are completely different from the claimed layers in that the layers are not separated by an insulating film as recited in the claims. At column 9, lines 28-45, Tanaka explains that the first and second conductive films are simultaneously formed when forming scanning electrodes or signal electrodes. Thus, these first and second conductive films 25 and 26 are formed on the same surface and cannot be separated by an insulating film. This is shown in Tanaka's Fig. 1.

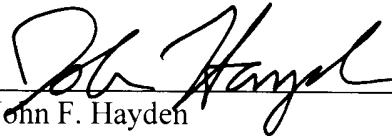
In contrast, the rejected claims require an insulating film between the first and second plurality of conductive layers. Tanaka clearly could not do this in view of the above. Therefore even if Mawatari were modified to include Tanaka's first and second conductive layers, the combination would not have an insulating film between the layers and, accordingly, would be different from the claimed structure.

In addition, the rejected claims require the first conductive layers to be formed of a same material as the plurality of scanning lines; and also require the second plurality of conductive layers to be formed of a same material as the plurality of signal lines. Tanaka fails to teach this combination. Instead, the first and second conductive films 25 and 26 are associated with signal electrodes. This is very different than what is claimed. The rejected claims require that both the first and second plurality of conductive layers are formed between the first substrate and the sealing member. This is not taught or suggested by Mawatari in view of Tanaka. Nor does JP 6-51332 remedy the failure of Mawatari and Tanaka to describe at least this feature of the claims.

Accordingly, for the reasons noted above, it is respectfully suggested that all of the claims are in condition for allowance.

Enclosed is a \$110 check for the Petition for Extension of Time fee. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,



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